

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

FRED LEE and ANN LEE,

Plaintiffs,

NOTICE OF MOTION

-against-

Case No.: 1:20-cv-03191 (MKB)(PK)

UNION MUTUAL FIRE INSURANCE COMPANY,

Defendant.

-----X

MOTION MADE BY:

GREENBLATT AGULNICK KREMIN, P.C., 55 Northern Boulevard, Suite 302, Great Neck, New York 11021, attorneys for Plaintiffs, FRED LEE and ANN LEE

DATE, TIME AND
PLACE OF HEARING:

On a day and time to be set by the Court, at the Thurgood Marshall United States Court House, United States District Court, 225 Cadman Plaza East, Brooklyn, New York, 11021, before Honorable Judge Margo K. Brodie.

SUPPORTING PAPERS:

Affirmation of Scott E. Agulnick, Esq., sworn to on the 25th day of October, 2021, the Affidavit of Fred Lee dated October 20, 2021, with attached exhibits, Plaintiffs FRED LEE and ANN LEE's Memorandum of Law, and all pleadings and proceedings has herein.

RELIEF DEMANDED
AND GROUNDS:

(1) pursuant to F.R.C.P. § 56 granting Plaintiff summary judgment; and

(2) for such other and further relief as this Court deems just, equitable and proper.

TYPE OF ACTION:

Breach of contract

ORAL ARGUMENT:

Oral argument is not requested.

Dated: Great Neck, New York
October 25, 2021

Yours, etc.,

GREENBLATT AGULNICK KREMIN, P.C.

By: _____ /s/

Scott E. Agulnick, Esq.

Todd D. Kremin, Esq.

Attorneys for Plaintiff

FRED LEE and ANN LEE

55 Northern Boulevard, Suite 302

Great Neck, New York 11021

Tel: (718) 352-4800

To:

Eric T. Boron, Esq.
HURWITZ & FINE, P.C.
Attorneys for Defendant
**UNION MUTUAL FIRE INSURANCE
COMPANY**
1300 Liberty Building
Buffalo, New York 14202
Tel: (716) 849-8900